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12 *Attorneys for Defendant,
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14 **UNITED STATES DISTRICT COURT**

15 **DISTRICT OF NEVADA**

16 U.S. BANK N.A., SUCCESSOR
17 TRUSTEE TO BANK OF AMERICA,
18 N.A., SUCCESSOR IN INTEREST TO
19 LASALLE BANK N.A., ON BEHALF OF
20 THE REGISTERED HOLDERS OF BEAR
21 STEARNS ASSET BACKED
22 SECURITIES I LLC, ASSET-BACKED
23 CERTIFICATES, SERIES 2005-HE6,

24 Plaintiff,

25 vs.

26 TERRAFIRMA VENTURE LLC, a Nevada
27 corporation; TREASURES LANDSCAPE
MAINTENANCE ASSOCIATION, a
Nevada non-profit corporation,

Defendants.

CASE NO.: 2:17-cv-01890-JCM-NJK

**STIPULATION AND ORDER TO
EXTEND TIME TO RESPOND TO U.S.
BANK'S OPPOSITION TO MOTION
TO DISMISS [ECF NO. 31]**

(THIRD REQUEST)

28 Defendant TREASURES LANDSCAPE MAINTENANCE ASSOCIATION
29 ("HOA"), and Plaintiff U.S. BANK N.A., SUCCESSOR TRUSTEE TO BANK OF
30 AMERICA, N.A., SUCCESSOR IN INTEREST TO LASALLE BANK N.A., ON BEHALF
31 OF THE REGISTERED HOLDERS OF BEAR STEARNS ASSET BACKED
32 SECURITIES I LLC, ASSET-BACKED CERTIFICATES, SERIES 2005-HE6 ("Plaintiff"),
33 by and through their respective counsel, hereby agree and stipulate as follows:

34 1. On November 27, 2017, HOA filed a Motion to Dismiss or, in the
35 Alternative, Motion for Summary Judgment, ECF No. 18.

1 2. On January 4, 2018, Plaintiff filed Memorandum in Opposition to
2 Treasures Landscape Maintenance Association's Motion to Dismiss or, in the
3 Alternative, Motion for Summary Judgment ("Opposition"), ECF No. 31.

4 3. On January 11, 2018, by virtue of a Stipulation and Order (First Request)
5 filed in this case, HOA was granted up to and including January 28, 2018 to file response
6 to Plaintiff's Opposition, ECF No. 33.

7 4. After the new year, the HOA's counsel became sick with the flu and the
8 court and Plaintiff graciously agreed to extend the Reply briefing deadline. In fact, her
9 son and husband also were ill.

10 5. Now, unfortunately, the Lipson Neilson local experienced a – hopefully
11 temporary – network system crash and HOA's counsel has no access to documents,
12 including pleadings and discovery – necessary to complete the Reply brief. A
13 computer technician is working on the network issues currently but there is no known
14 timeframe for resolution of the network issues.

15 6. Plaintiffs counsel has once again graciously agreed to extend the Reply
16 brief deadline two weeks to February 16, 2018.

17 7. This is the parties' third request for an extension of these deadlines, which
18 may be unusual but is with good cause.

19 8. This stipulation is made solely as the parties' way of accommodating one
20 another and is not in any way intended for the purposes of prejudice or delay.

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1 For the above stated reasons, IT IS HEREBY AGREED AND STIPULATED, that
2 the deadline for HOA to file Reply to Plaintiff's Opposition [ECF No. 31] shall be
3 extended to **February 9, 2018**.

4 DATED this ____ day of January, 2018.

5 DATED this ____ day of January, 2018.

6 BALLARD SPAHR, LLP

7 LIPSON NEILSON, P.C.

8 By: /s/ Justin A. Shiroff

9 By: /s/ Lisa J. Zastrow

10 Justin A. Shiroff, Esq. (Bar #12869)
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13 *Attorneys for Plaintiff*

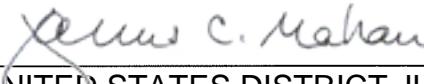
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18 *Attorneys for Defendant*
19 *Treasures Landscape Maintenance*
20 *Association*

21 ORDER

22 IT IS SO ORDERED.

23 DATED February 2, 2018.

24 
25 UNITED STATES DISTRICT JUDGE

26 Submitted by:

27 LIPSON NEILSON, P.C.

28 By: /s/ Lisa J. Zastrow

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Treasures Landscape Maintenance Association